

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Firs Home Owners Association,

Plaintiff,

v.

City of SeaTac, a Municipal Corporation,

Defendant.

NO. 2:19-cv-01130-RSL

DECLARATION OF QUINN N. PLANT  
IN SUPPORT OF DEFENDANT'S  
MOTION TO EXCLUDE EXPERT  
OPINION TESTIMONY OF DR.  
LAMONT GREEN

Pursuant to 28 U.S.C. § 1746, I, Quinn N. Plant state and declare under penalty of perjury as follows:

1. I am an attorney of record for defendant City of SeaTac. This declaration is based on my own personal knowledge.

2. On December 10, 2020, the plaintiff produced an expert report prepared by the Racial Equity Action Lab. A true and correct copy of the transmittal email and expert report is attached hereto as Exhibit A.

3. On January 12, 2021, the plaintiff produced a copy of Dr. LaMont Green's resume, a true and correct copy of which is attached as Exhibit B.

DECLARATION OF QUINN PLANT  
IN SUPPORT OF DEFENDANT'S MOTION  
TO EXCLUDE EXPERT OPINION TESTIMONY  
OF DR. LAMONT GREEN - 1  
NO. 2:19-cv-01130-RSL

**MENKE JACKSON BEYER, LLP**  
807 North 39<sup>th</sup> Avenue  
Yakima, WA 98902  
Telephone (509)575-0313  
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1  
2 4. On January 13, 2021, the plaintiff provided a second supplemental response  
3 to discovery propounded by defendant City of SeaTac. In this response, the plaintiff  
4 revealed that they intended to call Dr. LaMont Green as a testifying expert. A true and  
5 correct excerpt of the discovery response is attached as Exhibit C.

6  
7 5. On page 7 of the REAL report, Dr. Green gives a two sentence definition of  
8 the term "microaggression," for which he cites following website:  
9 diversity.nih.gov/sociocultural-factors/microaggressions. On March 8, 2021, I printed a  
10 copy of this webpage page. The website contains the first, but not the second, sentence of  
11 the definition quoted by Dr. Green on page 7 of the REAL report. A true and correct  
12 printout of the cited webpage is attached hereto as Exhibit D.

13  
14 6. On October 6, 2016, the SeaTac City Council held a town hall meeting.  
15 Residents of the Firs Mobile Home Park attended the meeting. They were accompanied by  
16 an employee of the Tenants Union of Washington State, Monica Mendoza-Castrejon.  
17 During the public comment section of the meeting, the residents gave public comment about  
18 the proposed closure of the Firs Mobile Home Park. The City had portions of the audio  
19 recording of this meeting transcribed. The transcript was produced to the plaintiff in  
20 discovery.

21  
22 7. By email on January 12, 2020, the HOA's legal counsel disclosed documents  
23 that had been assembled and transmitted to REAL (or Dr. Green) for review. These  
24 documents included the transcript of the October 6, 2016, town hall meeting. This transcript  
25 is referenced on pages 3 and 4 of the REAL report. A true and correct copy of the transcript  
26 has been filed at Dkt. #93-9.

27  
28 DECLARATION OF QUINN PLANT  
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1  
2 8. On October 17, 2016, the City's planning staff approved the relocation plan  
3 submitted by Fife Motel.

4 9. On October 25, 2016, the SeaTac City Council held a study session.  
5 Residents of the Firs Mobile Home Park attended the study session. They were again  
6 accompanied by Ms. Mendoza-Castrejon. During the public comment section of the  
7 meeting, the residents again gave public comment about the proposed closure of the Firs  
8 Mobile Home Park. The City had portions of the audio recording of this meeting  
9 transcribed. The transcript was produced to the plaintiff in discovery.  
10

11 10. By email on January 12, 2020, the HOA's legal counsel disclosed documents  
12 that had been assembled and transmitted to REAL (or Dr. Green) for review. These  
13 documents included the transcript of the October 25, 2016, town hall meeting. This  
14 transcript is referenced on pages 5 of the REAL report. A true and correct copy of the  
15 transcript has been filed at Dkt. #93-10.  
16

17 I declare under penalty of perjury under the laws of the State of Washington that the  
18 foregoing declaration is true and correct.

19 DATED THIS 8th day of March, 2021, at Yakima, Washington.

20  
21 /s/ Quinn N. Plant  
22 QUINN N. PLANT  
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28 DECLARATION OF QUINN PLANT  
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CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2021, I filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the following:

V. Omar Barraza	<a href="mailto:omar@barrazalaw.com">omar@barrazalaw.com</a>
Christina L. Henry	<a href="mailto:chenry@hdm-legal.com">chenry@hdm-legal.com</a>
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Mark S. Johnsen	<a href="mailto:mjohnsen@seatacwa.gov">mjohnsen@seatacwa.gov</a>
Brendan W. Donckers	<a href="mailto:bdonckers@bjtlegal.com">bdonckers@bjtlegal.com</a>

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

None.

s/ QUINN N. PLANT  
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